

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 07 CR 50072-01
	)	
MITCHEL A. FUCHS	)	Magistrate Judge Mahoney

**AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER**

The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves this court to enter an agreed protective order, and states:

1. The government's pretrial discovery includes confidential agency reports, witness statements, grand jury materials, and other materials which are sensitive in nature.
2. The United States seeks the entry of an order designed to protect the confidentiality of the information contained in these materials. A draft order, signed by counsel for the government and the defendant, is submitted herewith.
3. Counsel for the defendant agrees with this motion and to the entry of such order.

WHEREFORE, the United States respectfully requests the court to enter the proposed Protective Order.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: /Scott A. Verseman  
SCOTT A. VERSEMAN  
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**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the foregoing: “Agreed Motion for Entry of Protective Order” was served on January 11, 2008, pursuant to the district court’s ECF system, on all ECF filers.

/Scott A. Verseman

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